

[Insert Date]

Dear Senators Thune and Nelson,

Thank you for allowing the [insert name of organization] the opportunity to comment on S. 424, the Wi-Fi Innovation Act. [Insert brief description of organization including the number of members, its mission, why road safety is important to that mission]

Our mission is to reduce injuries and fatalities from road crashes, the fourth leading cause of death in the United States. Unfortunately, motor vehicle crashes remain the top cause of death for young and older Americans alike and constitutes a major risk for all Americans throughout their lives. The road safety spectrum, more commonly known as the 5.9 GHz band, has been allocated for use by V2V and other public road safety technologies. Our focus on reducing injuries and fatalities on our nation's roadways leads us to urge you to take caution with regards to the requirements proposed by the bill for the sharing of the road safety spectrum with unlicensed devices. If not properly designed and tested, such unlicensed usage might result in interference or harm to the advancement of lifesaving technologies such as Vehicle-to-Everything (V2X) communications or Dedicated Short Range Communications Services systems (DSRC).

Highway crash statistics over the last century have proven that human error is a major contributor to tragedies on our public roadways. New vehicle safety technology, such as V2X, serve as a backup to humans and has the potential to be a game changer for safety. The potential to reduce the severity and frequency of crashes is real. While as a nation, we have invested a great deal in research and intervention strategies involving teen drivers, drunk drivers, distracted drivers, and un-belted drivers, we have not been able to eliminate these deaths on our roadways. The long-term value of the road safety spectrum to the future of driving should not be sacrificed for the short term consideration of allowing additional unlicensed broadband use in the band. In fact, allowing unlicensed broadband use in the road safety spectrum, which is absolutely essential to the DSRC-based technologies, will only meet a small fraction of the forecasted need for broadband wireless spectrum in the future.

We are not opposed to spectrum sharing, but urge caution in ensuring that allocated frequencies for DSRC and V2X technologies remain free of interference. As the National Highway Traffic Safety Administration (NHTSA) has stated, V2X technologies "could address approximately 80% of the crash scenarios involving non-impaired drivers."

On behalf of [insert name of organization] thank you again for your consideration.

Sincerely,